

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America

v.

SHAWN WILLIAMS

Defendant(s)

Case No.

3:19 mj 450

2019 AUG -8 PM 1:30

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 8, 2019 in the county of _____ in the
Southern District of Ohio, the defendant(s) violated:

Code Section

18 U.S.C. 922(g)(1)

Offense Description

Possession of a firearm after having been previously convicted of a felony offense

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.


Complainant's signature

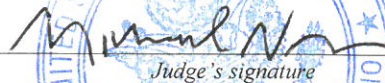
Jason E. Rhodes, Task Force Officer, FBI

Printed name and title

Sworn to before me and signed in my presence.

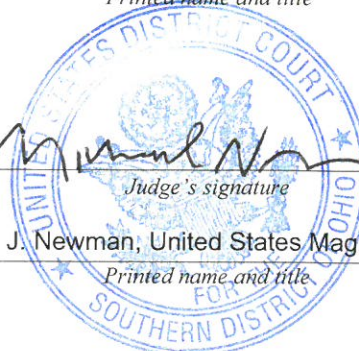
Date: 08/08/2019

City and state: Dayton, Ohio


Judge's signature

Michael J. Newman, United States Magistrate Judge

Printed name and title



AFFIDAVIT

Jason E. Rhodes, a Task Force Officer for the Federal Bureau of Investigation (“FBI”) and City of Dayton Police Department officer being duly sworn, deposes as follows:

INTRODUCTION

1. I am a Task Force Officer (“TFO”) with the United States Federal Bureau of Investigation (“FBI”) within the meaning of Title 21, United States Code (“U.S.C.”), Section 878, that is, an officer of the United States who is empowered by law to conduct criminal investigations of and to make arrests for offenses as detailed in 21 U.S.C. § 878.
2. I have been employed in law enforcement since 2007. I currently serve as an officer with the Dayton Police Department (“DPD”). Since June 2016, I have been assigned to the Community Initiative to Reduce Gun Violence “CIRGV” Task Force, and in November 2017, I became a TFO with the FBI Safe Streets Task Force. Since 2013, I have been dedicated to the investigation of narcotics, firearms and gang offenses. I have been involved in firearm-related arrests, executed search warrants that resulted in the seizure of narcotics and firearms, participated in undercover narcotics purchases, and supervised the activities of informants who have provided information and assistance resulting in narcotics purchases.
3. This affidavit is made in support of an application for a complaint against **Shawn W. Williams** (“**WILLIAMS**”) for a violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), that being “Possession of a firearm after having been previously convicted of a felony offense.”
4. The facts in this affidavit are submitted for the purpose of establishing probable cause, and do not include every fact known in the investigation.

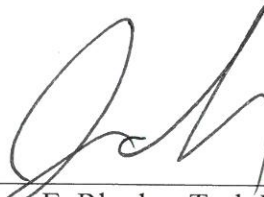
FACTS

5. On August 7, 2019, United States Magistrate Judge Michael J. Newman signed a search warrant that your Affiant authored for 1955 Kipling Drive, Dayton, Ohio. The items to be seized on the search warrant included, but were not limited to, controlled substances, cellular phones, cash, firearms, and ammunition. Previously, a confidential informant had made law enforcement-directed purchases of methamphetamine and/or a heroin/fentanyl mixture on two separate dates in July 2019 inside 1955 Kipling Drive. The informant identified **WILLIAMS** as the person who sold the drugs on those two occasions.
6. On August 8, 2019, at about 0600 hours, the search warrant was executed by F.B.I. S.W.A.T. **WILLIAMS** was the lone occupant inside the residence. A .40 caliber Glock handgun (serial number was MVW235) loaded with 15 rounds was located in the console of the couch in the living room. There was a safe on the top shelf of a closet in the hallway leading from the living room to the back two bedrooms and one bathroom. Inside the safe there was a Mossberg .22 caliber pistol, serial number ENK3998004, loaded with 20

rounds. Also inside the safe was a Taurus Millennium G2 9mm, serial number TKN80207, loaded with 12 rounds. Also inside the safe was a 50 round drum magazine for a .40 caliber Glock handgun, like the one found in the living room. The magazine was loaded with 50 rounds. Also inside the safe was a magazine for a .40 caliber Glock loaded with 9 rounds. In addition, there was a box of .40 caliber Federal rounds and a box of 62 9mm Winchester rounds that were in the safe. There was also a .40 caliber Glock magazine loaded with 2 rounds that was found in a drawer in the kitchen.


7. In a kitchen cabinet there was a bag that weighed 21.2 grams and contained suspected methamphetamine. The suspected methamphetamine was tested with a field test kit which indicated a positive presence of methamphetamine. Also found with the bag were three digital scales which appeared to have drug residue on them. There was a bag of white powder in a drawer in the kitchen that weighed 15.2 grams and another bag on the kitchen powder that weighed 1.47 grams. Both bags appeared to be fentanyl, which is unable to be field tested. All of the suspected drugs will be sent to the Miami Valley Regional Crime Laboratory for further analysis.
8. There was an Ohio Bureau of Motor Vehicle registration paperwork in **WILLIAMS'** name for a Buick parked in the driveway of the 1955 Kipling Drive. There was also Federal court paperwork **WILLIAMS'** name inside the residence. **WILLIAMS** is presently charged in United States District Court, Southern District of Ohio at Dayton, with a violation of 18 U.S.C. § 922(g)(1) arising from an earlier encounter involving Affiant on or about January 7, 2019. It should also be noted that there were two bedrooms inside the house. Only one bedroom was set up with a bed for sleeping on. The other bedroom was filled with miscellaneous items that covered the entire floor of the room.
9. I read **WILLIAMS** his constitutional rights warning while he was in the backseat of a marked cruiser and he understood his rights, but he did not wish to speak with me.
10. A check of **WILLIAMS'** criminal history revealed a conviction from July 19, 2006, in the Common Pleas Court of Montgomery County Ohio for rape, a felony of the first degree, case number 2006CR00031. This crime is punishable by greater than one year imprisonment.
11. On August 8, 2019, Affiant spoke with Special Agent Chris Reed of the Bureau of Alcohol, Tobacco, Firearms and Explosives. Reed advised that the Taurus firearm was manufactured outside the state of Ohio, and thus moved in interstate commerce.

12. Based on the above information, I believe that probable cause exists to conclude that on or about August 8, 2019, while in the Southern District of Ohio, **WILLIAMS** possessed a firearm after having been previously convicted of a felony offense, a violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).



Jason E. Rhodes, Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to before me this 8th day of August, 2019.


HONORABLE MICHAEL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE